

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF IOWA

In re:

**MERCY HOSPITAL, IOWA CITY, IOWA, et al.,**

Debtors.

Chapter 11

Case No. 23-00623

Jointly Administered

**NOTICE OF FILING AND OBJECTION DEADLINE  
THIRD MONTHLY APPLICATION FOR COMPENSATION AND  
EXPENSE REIMBURSEMENT FOR PATIENT CARE OMBUDSMAN  
PERIOD November 1, 2023 – November 30, 2023**

**PLEASE TAKE NOTICE** that, on January 12, 2024, the *Third Monthly Application for Compensation and Expense Reimbursement for Patient Care Ombudsman – Period November 1, 2023 – November 30, 2023* (the “**Application**”) was filed with the United States Bankruptcy Court for the Northern District of Iowa (the “**Court**”) at Docket No. 641.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Application or the relief requested therein must be made in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 224] (the “**Interim Compensation Order**”) and must be filed with the Court at **111 7<sup>th</sup> Ave. SE, Cedar Rapids, IA 52401**, and served and received by the following parties listed in the Interim Compensation Order no later than **January 26, 2024, at 4:00 p.m. (Central Time)**:

- a. **Mercy Hospital**, Iowa City, Iowa, 500 E. Market Street, Iowa City, Iowa 52245, Attn: Mark E. Toney ([noticing@mercyic.org](mailto:noticing@mercyic.org));
- b. **Counsel to the Debtor**, (A) McDermott Will & Emery LLP, 444 W. Lake Street, Suite 4000, Chicago, Illinois 60606, Attn: Felicia Gerber Perlman, ([fperlman@mwe.com](mailto:fperlman@mwe.com)), Daniel M. Simon, ([dsimon@mwe.com](mailto:dsimon@mwe.com)), and Emily C. Keil, ([ekeil@mwe.com](mailto:ekeil@mwe.com)) and 2501 North Harwood Street, Suite 1900, Dallas, TX 75201, Jack G. Haake, ([jhaake@mwe.com](mailto:jhaake@mwe.com)) and (B) Nyemaster Goode, P.C., 625 FirstStreet SE, Suite 400, Cedar Rapids, IA 52401-2030, Attn: Roy R. Leaf, ([rleaf@nyemaster.com](mailto:rleaf@nyemaster.com));
- c. **Counsel to the Committee**, Cutler Law Firm, P.C., 1307 50th Street, West Des Moines, IA 50266, Attn: Robert C. Gainer, ([rgainer@cutlerfirm.com](mailto:rgainer@cutlerfirm.com)) and SillsCummis & Gross P.C., The Legal Center, One Riverfront Plaza, Newark, NJ 07102, Attn: Andrew H. Sherman, ([asherman@sillscummis.com](mailto:asherman@sillscummis.com)) and Boris Mankovetskiy, ([bmankovetskiy@sillscummis.com](mailto:bmankovetskiy@sillscummis.com));
- d. **Office of the United States Trustee for the Northern District of Iowa**, 111 Seventh Avenue SE, Suite 2800, Cedar Rapids, IA, 52401, Attn: Janet G.L. Reasoner

(Janet.G.Reasoner@usdoj.gov); and

e. **Counsel to the Bondholder**, Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C., One Financial Center, Boston, MA 02111, Attn: William Kannel (wkannel@mintz.com), Nathan F. Coco (nfcoco@mintz.com), and Megan Preusker (mpreusker@mintz.com) and Whitfield & Eddy, P.C., 699 Walnut Street, Suite 2000, Des Moines, IA 5030, Attn: Peter J. Chalik ([chalik@whitfieldlaw.com](mailto:chalik@whitfieldlaw.com)).

**PLEASE TAKE FURTHER NOTICE** that, if an objection is properly filed and served in accordance with the above procedures, a hearing (the “**Hearing**”) on the Application will be held at a time and date to be determined before the Honorable Thad J. Collins, United States Bankruptcy Judge, United States Bankruptcy Court for the Northern District of Iowa, 111 7th Ave. SE, Cedar Rapids, IA 52401. Only objections made in writing and timely filed and received will be considered by the Court at such Hearing.

**PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO THE APPLICATION ARE TIMELY FILED AND RECEIVED IN ACCORDANCE WITH THE INTERIM COMPENSATION ORDER, THE DEBTORS MAY PAY THE FEES SOUGHT IN THE APPLICATION IN ACCORDANCE WITH THE INTERIM COMPENSATION ORDER.**

DATED: January 16, 2024.

By: /s/Susan N. Goodman, RN JD

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Patient Care Ombudsman

### **CERTIFICATE OF SERVICE**

I, Susan N. Goodman, hereby certify that on January 12, 2024, a true and correct copy of the Application was filed with the Clerk of Court using Northern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to parties of this case. Although this pleading was inadvertently not filed until January 16, 2024, all the parties requiring notice of the Application filing were served on January 12, 2024. Accordingly, the bar date remains unchanged.

DATED: January 16, 2024.

By: /s/Susan N. Goodman, RN JD

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